



MEMO ENDORSED

MURIEL GOODE-TRUFANT
Corporation Counsel

**THE CITY OF NEW YORK
LAW DEPARTMENT**
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June 17, 2025

VIA ECF

Hon. Gary Stein
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Room 702
New York, New York 10007

Re: *Ciotti v. City of New York et al.*, No. 1:23-cv-10279 (ER)

Dear Judge Stein:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for Defendant City of New York in the above-referenced action. I write to respectfully request that Your Honor adjourn the Pre-Settlement Conference Call currently scheduled for June 18, 2025 at 3:00 p.m. by approximately two weeks, until the week of June 30, 2025. This is the City's first request to adjourn the Pre-Settlement Conference Call. Plaintiff "will not take any position," and Defendant Jamie Angelastro "take[s] no position," on the City's request to adjourn the call.

As an initial matter, our Office offers its sincerest apologies for making this request within 48 hours of the Pre-Settlement Conference Call. The brief extension is requested is to allow our Office additional time to reassign the case to another ACC and then allow the new ACC to familiarize themselves with the case. I was assigned this case on June 11, 2025 in preparation for the departure of ACC Ruth Jeannite, and I contacted Plaintiff's counsel to let her know I was the new attorney for the City. However, the next day, June 12, 2025, I provided notice to this Office that I accepted a position with a law firm and that I will be departing this Office on July 11, 2025. I am not fully familiar with the facts in this case, and in the interest of the Court's limited time and resources, it would not be productive to hold the call tomorrow even for the purpose of setting a date for the settlement conference because I may be agreeing to a date that would not work for the newly assigned ACC.

Moreover, given that Your Honor's Order, ECF No. 70, indicated that the settlement conference would not occur until after August 8, 2025 and that Angelastro's attorney

relayed that he and Angelastro would not be available until August 26, 2025 at the earliest, a short 13- or 14-day adjournment of the Pre-Settlement Conference Call would not significantly affect any other dates associated with the settlement conference. Accordingly, the City requests that the Court adjourn the Pre-Settlement Conference Call until the week of June 30, 2025.

I thank the Court for its consideration of this matter.

Respectfully submitted,

Steven E. Smith

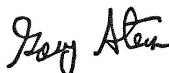
Steven E. Smith
Assistant Corporation Counsel

cc: All Counsel of Record (via ECF)

Application granted. The pre-settlement conference call is hereby adjourned to July 7, 2025 at 2:00 p.m.

Date: June 17, 2025
New York, NY

SO ORDERED:



HON. GARY STEIN
UNITED STATES MAGISTRATE JUDGE